

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MARYA J. LEBER, SARA L. KENNEDY,
LESLIE HIGHSMITH, SHERRI M. HARRIS *and all
others similarly situated,*

Plaintiffs,

07-cv-09329-SHS

-against-

THE CITIGROUP 401(K) PLAN INVESTMENT
COMMITTEE, et al.,

Defendants.
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PLAINTIFFS' NOTICE OF MOTION FOR CLASS CERTIFICATION

PLEASE TAKE NOTICE that Plaintiffs will call up for hearing a Motion for Class Certification in the above entitled action. Plaintiffs respectfully request that the Court, pursuant to Fed. R. Civ. P. 23 enter an Order certifying this action as a class action under Rule 23(b)(1) (or in the alternative 23(b)(3)), approving the named Plaintiffs as class representatives, approving J. Brian McTigue, James A. Moore, and their law firm McTigue Law LLP, and Gregory Y Porter and his law firm Bailey & Glasser LLP, as class counsel, and approving David S. Preminger and his law firm Keller Rohrback LLP as liaison counsel for the class, along with such other relief as this Court deems just and proper.

The Motion is based on this Notice, the Declaration of James A. Moore, with exhibits, and Plaintiffs' Memorandum of Law submitted in support of the Motion.

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/s/ James A. Moore
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Liaison Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, a copy of the foregoing **PLAINTIFFS' NOTICE OF MOTION TO CERTIFY CLASS** was filed electronically with the Court and served by operation of the Court's ECF notification system upon Defendants' counsel of record.

Dated: September 18, 2015,

/s/James A. Moore
James A. Moore